IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

DEBORAH J. SINATRA, : Chapter 13

d/b/a DEBORAH SINATRA INTERIORS

Debtor(s)

.

WILMINGTON SAVINGS FUND : Case No: 5-20-00301-RNO

SOCIETY, FSB, d/b/a CHRISTIANA : TRUST, NOT INDIVIDUALLY BUT AS : TRUSTEE FOR PRETIUM MORTGAGE :

ACQUISITION TRUST

Movant(s)

VS.

:

DEBORAH J. SINATRA,

d/b/a DEBORAH SINATRA INTERIORS : CHARLES J. DEHART, III, Ch. 13 Trustee : Respondent(s) :

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RESPONSE TO MOTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB, d/b/a CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PRETIUM MORTGAGE ACQUISITION TRUST FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 62

AND NOW COMES, Deborah J. Sinatra, d/b/a Deborah Sinatra Interiors, by and through her attorney, Kimberly D. Martin, and files this Response as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Denied and strict proof thereof is demanded at trial.
- 7. Denied and strict proof thereof is demanded at trial.

- 8. Denied and strict proof thereof is demanded at trial.
- 9. Denied and strict proof thereof is demanded at trial.
- 10. Denied and strict proof thereof is demanded at trial.

WHEREFORE, Deborah J. Sinatra, d/b/a Deborah Sinatra Interiors, Debtor, respectfully requests this Honorable Court deny Movant's Motion for Relief and for such other and further relief as the Court deems just and proper.

Dated: 09/17/2020 Respectfully Submitted,

/s/ Kimberly D. Martin, Esquire 1022 Court Street Honesdale, PA 18431 (570) 253-6899 Attorney for Debtor kmartin@martin-law.net